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Attorneys for Defendant
KEOLIS TRANSIT AMERICA, INC.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

TRUSTEES OF THE NORTHERN
CALIFORNIA GENERAL
TEAMSTERS SECURITY FUND,

Plaintiff,

V.

KEOLIS TRANSIT AMERICA,
INC., a Delaware corporation,

Defendant.

Case No. 2:21-cv-00205-MCE-AC

Assigned to Hon. Morrison C. England, Jr.

**DECLARATION OF MARJORIE
KNIGHT IN SUPPORT OF
DEFENDANT KEOLIS TRANSIT
AMERICA, INC.'S MOTION TO SET
ASIDE CLERK'S ENTRY OF
DEFAULT**

Complaint Filed: February 2, 2021

**DECLARATION OF MARJORIE KNIGHT IN SUPPORT OF DEFENDANT KEOLIS
TRANSIT AMERICA, INC.'S MOTION TO SET ASIDE CLERK'S ENTRY OF DEFAULT**

DECLARATION OF MARJORIE KNIGHT

I, Marjorie Knight, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

- 4 1. I am a resident of the state of Nevada and over eighteen years of age.
 - 5 2. I am currently, and at all relevant times was, VP Claim Management at
 - 6 Keolis Transit America, Inc. (“Keolis”).
 - 7 3. I make this Declaration in support of Defendant Keolis Transit America,
 - 8 Inc.’s Motion to Set Aside Clerk’s Entry of Default. This Declaration is based upon my
 - 9 own personal knowledge obtained through my role as VP Claims Management for
 - 0 Keolis, and I can and will competently testify to such facts under oath.

4. Keolis' knowledge of the above-captioned action was delayed due to the changed working environment during COVID-19. At the time the Complaint was served on the company, it was not immediately processed due to significant changes in Keolis' working processes resulting the changed working environment during the COVID-19 pandemic.

5. Upon learning of the clerk's March 5, 2021 entry of default, Keolis has diligently sought to investigate the circumstances surrounding Keolis's inadvertent delay in processing, and has worked diligently to submit the Motion to Set Aside Clerk's Entry of Default, submitted herewith, as quickly as possible after learning of the existence of this action and of the clerk's entry of default.

Executed on March 24, 2021, in Clark County, Nevada.

Marjorie Knight 3/24/2021
Marjorie Knight Date
KTA VP Claims Management

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2021, a copy of the foregoing was served on all counsel of record via the CM/ECF system.

Dated: March 24, 2021

AKERMAN LLP

By: /s/ Damien P. DeLaney

Damien P. DeLaney
Ashley N. Bobo

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KEOLIS TRANSIT AMERICA, INC.

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